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The Movement to Decommodify Housing: Property Sources for Non-Speculative Housing in Los Angeles County

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Publication Date

2022-06-23

THE MOVEMENT TO DECOMMODY HOUSING

Property Sources for Non-Speculative Housing in Los Angeles County

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June 1, 2022

*A comprehensive project submitted in partial satisfaction of the requirements
for the degree Master of Urban and Regional Planning.*



Disclaimer

This report was prepared in partial fulfillment of the requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California, Los Angeles. It was prepared at the direction of the Department and of Strategic Actions for a Just Economy (SAJE) as a planning client. The views expressed herein are those of the authors and not necessarily those of the Department, the UCLA Luskin School of Public Affairs, UCLA as a whole, or the client.

Acknowledgments

Thank you to the folks in the housing movement who took time to speak with me about their work, including LA Voice, El Sereno Community Land Trust, Hillside Villa Tenant Association, and Venice Community Housing.

Thank you to Sonia Suresh at SAJE for providing support and guidance throughout the process. Thank you to Paavo Monkkonen for acting as faculty advisor for this project.

Thank you to the UCLA Lewis Center for Regional Policy Studies for providing support for this project.

As a land grant institution, the Lewis Center for Regional Policy Studies at UCLA acknowledges the Gabrielino/Tongva peoples as the traditional land caretakers of Tovaangar (Los Angeles basin, So. Channel Islands).

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Executive Summary

The Los Angeles Housing Movement Lab is a coalition of housing justice organizations co-led by Strategic Actions for a Just Economy (SAJE) to support the decommodification of housing in Los Angeles County. Their vision is for “all poor, working class, and people of color in Los Angeles County to live in high quality housing that is affordable and within stable, healthy, resilient, accessible, and vibrant communities” with a long-term goal to decommodify 20% of housing units in Los Angeles by 2050. The Movement Lab broadly defines *decommodified* as housing that no longer generates profit or acts as a vehicle for investment. The process of decommodifying housing includes acquisition of a property and then the ongoing ownership model. While there are a variety of ownership models, this project focuses on property sources, asking:

what are feasible property sources in Los Angeles County for decommodified housing?

Based on conversations with movement partners about their existing efforts to decommodify housing, I focus on four property types that encompass both production and preservation strategies: congregation-owned land, publicly-owned land, naturally occurring affordable housing, and expiring affordability covenants.

Unit Analysis Results

	Parcels	Acres	Units
Congregation-Owned Land	269	198	3,963
Publicly-Owned Land	2,995	7,300	146,033
Naturally Occurring Affordable Housing	4,815	--	47,513
Expiring Affordability Covenants	183	--	8,873
		Total	203,545

Congregation-Owned Land

- Though congregation-owned land has the smallest unit yield, these vacant parcels are more likely to be developed due to the organizing efforts of LA Voice.

Publicly-Owned Land

- Public land has by far the largest potential unit yield of all the property types, though this estimate likely includes sites that are not feasible for housing development. Even so, this is the most scalable production strategy.

Naturally Occurring Affordable Housing

- Naturally Occurring Affordable Housing has the largest unit yield for preservation strategies, encompassing existing units older than 20 years and affordable at 50% AMI.

Expiring Affordability Covenants

- Expiring affordability covenants account for over 8,000 units over the next five years – over the course of the LA Housing Movement Lab’s 2050 goal, many more covenants will expire and create opportunities for decommodification.

Feasibility Matrix Results

For the second part of the analysis, I created a feasibility matrix analysis to analyze each property type by five criteria: cost, scalability, community control, process barriers, and political will. Using interviews with tenant organizers, housing non-profits, developers, and planners, I ranked each criterion as favorable, unfavorable, or neutral:

	Cost	Scalability	Community Control	Process Barriers	Political Will
Congregation-Owned Land	Neutral	Neutral	Unfavorable	Favorable	Favorable
Publicly-Owned Land	Favorable	Favorable	Neutral	Unfavorable	Unfavorable
Naturally Occurring Affordable Housing	Favorable	Favorable	Favorable	Unfavorable	Neutral
Expiring Affordability Covenants	Neutral	Neutral	Neutral	Unfavorable	Unfavorable

Cost and Scalability

- Overall, each property source is either favorable or neutral for cost and scalability.
- The costs are compared relative to the new construction of an affordable housing development, which can cost over \$500,000 per unit in Los Angeles. Each property source produces or preserves housing in a way that is less than or significantly less than new construction.
- The unit analysis revealed the potential to scale each strategy far beyond existing efforts, with publicly-owned land and naturally occurring affordable housing yielding the largest number of units.

Community Control

- Congregation-owned land is ranked as unfavorable due to current reliance on the traditional affordable housing development process, which does not provide community ownership or tenant autonomy.
- Naturally occurring affordable housing is most favorable for community control due to current efforts by community land trusts to purchase affordable properties and preserve them within the trust.
- Publicly-owned land has multiple pathways with differing levels of community control. While there is currently no concentrated push to develop public lands for housing, such a program could design the RFP process to prioritize non-speculative solutions or maintain the land within a public trust.
- Expiring affordability covenants have a spectrum of strategies upon expiration -- a mission-driven housing non-profit could choose to extend the affordability covenants or, in the example of the Hillside Villa Tenants Association, tenants could pressure the city to use eminent domain and convert the building to resident ownership.

Process Barriers and Political Will

- Overall, political will and process barriers were unfavorable for these property sources.
- Decommunified housing strategies are not mainstream and financial, state, and non-profit infrastructures do not exist or are not compatible with alternative housing ownership. Removing these process barriers also requires the political will to enact the changes. Shifting political will among elected officials, government staff, and in the general public will require a dedicated campaign to change the narrative from housing as a commodity to housing as a human right.

Recommendations

From the results of the unit analysis and feasibility matrix analysis, I offer the following recommendations for strategy and policy advocacy for the LA Housing Movement Lab:

Congregation-Owned Land

- Create a congregational zoning overlay for housing development
- Create a congregational community land trust

Publicly-Owned Land

- Create a county-wide inventory of public land suitable for housing development
- Investigate water district owned land as a potential property source

Naturally Occurring Affordable Housing

- Pass a Tenant Opportunity to Purchase Act (TOPA)
- Extend the Los Angeles County Community Land Trust Pilot Program

Expiring Affordability Covenants

- Create a database of affordability covenant expiration dates
- Research strategies for expiring covenants beyond eminent domain

Overall

- Create a Los Angeles Public Bank to fund preservation and production of decommodified housing
- Pass SB-679 to create the Los Angeles County Affordable Housing Solutions Agency (LA CAHSA)
- Conduct further research on housing production and decommodification

Introduction

The Los Angeles Housing Movement Lab is a coalition of housing justice organizations co-led by Strategic Actions for a Just Economy (SAJE) to support the decommodification of housing in Los Angeles County. Coalition members include Alliance of Californians for Community Empowerment (ACCE), Koreatown Immigrant Workers Advocates (KIWA), Public Counsel, Alliance for Community Transit LA (ACT-LA), LA Voice, Community Power Collective (CPC), and Little Tokyo Service Center (LTSC). Their vision is for “all poor, working class, and people of color in Los Angeles County to live in high quality housing that is affordable and within stable, healthy, resilient, accessible, and vibrant communities.” The Movement Lab broadly defines *decommodified* as housing that no longer generates profit or acts as a vehicle for investment.

The LA Housing Movement Lab has five strategic goals:

1. Create a new cultural narrative that advances our vision for decommodified housing
2. Build the internal infrastructure required to sustain the work of the Decommodify Housing Project and movement partners
3. Decommodify 20% of all units in Los Angeles County by 2050 via a combination of new production and preservation of existing housing
4. Eliminate/reduce corporate interest in housing as a vehicle for wealth accumulation
5. Expand existing and new social safety net policies

This research project supports the third strategic goal of 20% decommodification by 2050. The Movement Lab determined the 20% figure by calculating the existing share of decommodified units in the county and then determining an attainable goal through conversations with movement partners.

Currently, approximately 12% of units in Los Angeles County are considered decommodified, including existing covenanted affordable housing units, public housing units, project and tenant-based Section 8, and community land trust properties. In absolute numbers, there are 174,000 decommodified units out of 1,374,000 total existing units. In order to achieve 20% decommodification, LA Housing Movement Lab needs to support the decommodification of 100,000 units.

However, this calculation does not include housing production goals for Los Angeles County – the 6th Cycle Regional Housing Needs Allocation (RHNA) is 812,000 units. By adding the RHNA goal to the number of total existing units, the Movement Lab actually needs to support closer to 260,000 decommodified units. While the RHNA allocation is only for the 2021-2029 cycle and does not capture all housing production needed by 2050, jurisdictions rarely meet their RHNA targets and this cycle’s production goals are significantly larger than previous cycles. Therefore, it is reasonable to state that **the Movement Lab needs to support the production of 260,000 decommodified units by 2050.**

Existing Decommodification Efforts

This research builds on some of the many existing efforts by housing justice organizations to decommodify housing in Los Angeles County.

LA Voice

LA Voice is a multi-faith community organization with a Faith in Housing initiative that seeks to build affordable housing on congregation-owned land in Los Angeles. They seek out congregations and work with them to develop vacant or underutilized land into affordable housing, primarily

using Low Income Housing Tax Credit (LIHTC) funding. While congregations can develop their land into housing without LA Voice, the organization is seeking to actively scale up this housing strategy across the County through building partnerships with individual congregations, working with developers, and advocating for policy changes.

El Sereno Community Land Trust

El Sereno CLT is “a group of committed residents and stakeholders who provide opportunities for the residents of El Sereno, Los Angeles to secure community spaces and housing that is decent, affordable, and that is held in stewardship by community members on a long-term basis.” They are currently working with Reclaiming Our Homes to bring vacant Caltrans-owned homes into the trust.

Hillside Villa Tenants Association

The Hillside Villa Tenants Association is a group of tenants living in a building with an expired affordability covenant. When the landlord immediately raised rents after the covenant expired, the tenants organized for the City to use eminent domain on their building to keep it affordable in perpetuity. The City Council passed a motion approving the use of eminent domain; however, the proposal has not yet passed the budget committee and the tenants continue to organize to place pressure on elected officials.

TRUST South LA

TRUST South LA is a community land trust working to stabilize housing in South Los Angeles. Their work includes the Community Mosaic Project, which acquires existing affordable housing units and converts them to community ownership within the land trust. TRUST is also a member of the Los Angeles CLT Coalition, which seeks to increase the capacity of land trusts in Los Angeles.

Research Question and Structure of Report

This report asks: what are feasible property sources for decommodified housing in Los Angeles County? Based on existing work, I have chosen to focus on four property sources: congregation-owned land, publicly-owned land, naturally occurring affordable housing, and expiring affordability covenants. I conduct a unit analysis to estimate the potential yield of each property source and then a feasibility matrix analysis to analyze opportunities and barriers to each.

The report is structured as follows: First, I begin with a **Literature Review** situating the movement to decommodify housing within the broader housing justice movement. Then, I explain describe data sources and the quantitative and qualitative analysis approach in **Methodology**. In **Findings and Analysis**, I present the results of the unit analysis and feasibility matrix for each of the four property sources. In the discussion, I identify trends and takeaways from the findings, then provide **Recommendations** for the Movement Lab going forward.

Literature Review

Two main questions guide this literature review: why should we decommodify housing and how should we decommodify housing? To answer why, I will situate the LA Housing Movement Lab's goals within the broader housing decommodification movement, particularly in the context of the ongoing housing crisis. I will focus on real estate speculation in the wake of the 2008 financial collapse and the current COVID-19 pandemic, then synthesize research that demonstrates decommodification as a solution to the housing crisis in Los Angeles County. To answer how, I will briefly overview different paths to decommodification, looking at various ownership models and land acquisition strategies for the preservation and production of housing. Finally, I will examine different frameworks for analyzing the efficacy of various decommodification strategies to inform my feasibility matrix analysis.

Why should we decommodify housing?

The current moment of the COVID-19 pandemic, expiring eviction moratoria, and impending eviction crisis can be understood as “emergency urbanism,” a confluence of global racial capitalism and a racialized public health crisis.¹ The pandemic has been particularly deadly in working-class communities of color and the resulting housing precarity also has disproportionate impact in those communities. In “Who Profits from Crisis,” a report analyzing corporate acquisition of housing in Los Angeles in the wake of the 2008 financial crisis, Graziani et al. found a “distinctive geography of racialized risk in Los Angeles, most evident in working-class communities of color with high rent burdens.” In these at-risk zip codes, the authors found significant buy-up of residential properties by corporate landlords after the Great Recession.² The acquisition of residential units by corporate landlords has real impacts on tenants – in a study of evictions in Atlanta, researchers found that post-foreclosure homes were 58% more likely to have an eviction and that institutional landlords were more likely to file eviction than “mom-and-pop” landlords.³ Uncertainty reigns as the crisis continues and the eviction moratoria begin to expire, threatening to unleash a wave of evictions.

This current moment of “emergency urbanism” exacerbated and brought into light longer historical process of Black and Indigenous land struggle. In *Development Arrested*, Clyde Woods describes how the plantation system first removed Indigenous people from the land and then continually worked to keep Black communities landless after the Civil War and throughout the 20th century.⁴ Woods shows how today's housing crisis is rooted in this history of land struggle and how Black communities resisted through autonomous land projects. Hilary Malson, in her forthcoming article “Reaping What We Sow: The Decolonizing Root of Black Experiments with Cooperative Housing and Land Tenure” situates modern efforts to decommodifying housing within the “centuries-long, global Black tradition of decolonization.”⁵ She traces the intellectual genealogy of community land trusts from African Socialist thought in Tanzania, sharecropping cooperatives in the American South, Fannie Lou Hamer's Freedom Farm Cooperative, and today's anti-gentrification fights. The impetus to decommodify housing in Los Angeles County today comes not only from soaring rents, evictions, and property speculation, but also from a deep history of Black decolonization efforts to secure autonomy through land and housing. In “Emergency Urbanism,” Ananya Roy offers a provocation: “the question at hand is whether such emergency presents the opportunity for a radical reconfiguration of the relationships among sovereignty, life, and property that are so central to American liberal democracy.”⁶

Role of Housing Justice Movements

Across the world, housing justice movements are enacting this radical reconfiguration by resisting the further financialization of housing and imagining new decommodified futures. In Spain after the 2008 foreclosure crisis, the Plataforma de Afectados por la Hipoteca blocked evictions, occupied banks, and occupied bank-owned housing, “contesting financial rent-extraction mechanisms on multiple levels.”⁷ Housing occupation is a popular tactic that underscores the

need for housing as a human right not a property right – in Oakland a group of unhoused mothers occupied a vacant investor-owned home,⁸ in El Sereno families occupied vacant Caltrans-owned homes,⁹ and in Philadelphia activists took over empty homes owned by the Housing Authority.¹⁰ Housing justice movements also work through electoral politics – a majority of Berlin residents voted for the expropriation of residential units from megalandlords,¹¹ while residents of St. Paul, Minnesota passed a broad-reaching rent stabilization ordinance.¹² Governmental responses during the pandemic opened new avenues to decommodification – eviction moratoria passed at federal and state levels stabilized housing for many, while judges in California approved the use of eminent domain on hotels for housing.¹³ These efforts are tied together through a rebuke of housing as a commodity and creating alternative housing systems to reclaim housing as homes.

What are the benefits of decommodifying housing?

The most immediate benefits of decommodified housing accrue to the residents of decommodified units. However, there is also preliminary research into how a robust decommodified sector can influence the commodified sector. In a study of community land trusts (CLTs) in Minneapolis during the 2008 foreclosure crisis, researchers found that spatial clustering of CLTs slowed the decline of surrounding property prices during the crisis and increased prices in the post-recession period.¹⁴ However, this study is limited by the small share of CLTs as compared to the overall housing sector in Minneapolis. In European countries with larger decommodified housing sectors, the housing markets can function as unitary rental markets, which are “markets in which barriers to non-profit providers competing on the rental market are removed.”¹⁵ In a unitary market, non-profit providers provide more affordable housing and draw renters away from for-profit providers, driving down for-profit rents as landlords compete for tenants.¹⁶ While the literature lacks studies on the effects of non-profit rental markets due to the challenges of international comparative housing studies, a case study of Austria’s social housing sector finds evidence of “a price-restraining influence of the social rent level on the overall market rents.”¹⁷

How has the current affordable housing system failed in Los Angeles?

In a 2020 report on Affordable Housing Outcomes, Los Angeles County identified a shortfall of 509,000 affordable units with 8,9000 units at-risk of market-rate conversion in the next five years.¹⁸ The report calls to increase affordable housing funding at the county and city level to supplement federal Low-Income Housing Tax Credit (LIHTC) funds. LIHTC financing is the most prevalent method for producing affordable housing by non-profit and for-profit developers.¹⁹ However, LIHTC-funded affordable housing does not fit within the decommodification typology – namely, community control and removal from the speculative market. Residents do not have ownership over the building and units can be converted to market-rate when the affordability covenants expire.

In a case study of three 100% affordable LIHTC developments in Santa Ana, CA, Sarmiento and Sims critique the Affordable Housing Complex (AHC) and find that “affordable housing can function to disrupt communities, displacing those with the least security, either directly or indirectly, or by providing housing options for those with the most access and choice from either within or outside the community.”²⁰ Further, they observe how “AHC actors can participate in the marginalization of radical alternatives,” positioning traditional state-funded affordable housing as oppositional to more radical decommodified alternatives.²¹ Los Angeles needs the community control, permanent affordability, and displacement prevention promised by decommodified solutions that LIHTC projects are unable to offer.

Additionally, the Affordable Housing Outcomes Report specifically calls attention to the 88% of deeply low income (15% AMI), 74% of extremely low income (30% AMI), and 40% of very low income (50% AMI) residents in Los Angeles County who pay over half their income on housing. While LIHTC rents are capped at 50-60% AMI, projects often “gravitate to these ceilings, rarely risking operating cost gaps by settings rents at ELI (30% AMI) levels.”²² While LIHTC incentivizes

developers to build affordable units, the program does not adequately serve the lowest-income populations. Existing affordable housing systems that operate within the housing market have not bridged the shortfall in affordable housing nor are able to reach the most vulnerable renters. LIHTC-projects do not prevent displacement, offer increased community control, or even ensure permanent affordability and are therefore not considered decommodified housing solutions.

How can housing be decommodified?

Housing decommodification takes many forms – from tenant syndicates in Germany to mutual aid housing in Uruguay to social housing in Austria.²³ The LA Housing Movement Lab broadly defines decommodified as any housing no longer used for profit or speculation and includes a variety of ownership models with differing relationships to the state, the market, and their residents.

In an international comparative study of ten public-cooperative housing models, Ferreri and Vidal (2021) defined “public-cooperative” as housing initiatives where residents maintain some ownership or control over their building and the units cannot be bought or sold on the open market.²⁴ Their conception of public-cooperative housing includes coordination with the state, characterized as “embedded autonomy.”²⁵ However, other models refuse entanglements with the state – activists from the Philadelphia Housing Action occupied and then received ownership of 59 vacant buildings from the Philadelphia Housing Authority. While the buildings required significant capital for rehabilitation and ongoing maintenance, activists rejected funding from LIHTC or charitable foundations in order to maintain their autonomy.²⁶ Additionally, activists intend to pursue a “cooperative ownership with deed restrictions” model, as opposed to partnering with an existing CLT, criticizing the CLT model for being run by white administrators and allowing residents to accrue equity on their homes.²⁷ The Los Angeles Housing Movement Lab and its movement partners encompass strategies from embedded autonomy to community land trusts to housing occupations.

In these examples, decommodification is primarily characterized by the ownership model. In the United States, the most common ownership models are community land trusts and limited equity cooperatives.²⁸ However, this project focuses on property sources for decommodified housing, which can then utilize any number of ownership models. Housing movements across the US have used a variety of sources and methods for the preservation and production of decommodified housing.

Preservation of existing affordable housing sources seeks to prevent displacement in the short term and build community autonomy through decommodification strategies in the long term. Sources for housing preservation can include foreclosed or distressed properties, at-risk Naturally Occurring Affordable housing, and LIHTC-funded properties with expiring affordability covenants.²⁹ Meanwhile, production strategies for decommodified housing meet the overall demand for more housing, particularly affordable housing. Property sources with lower land costs are desirable for decommodified housing, which include publicly owned empty land or vacant buildings,³⁰ church-owned land, and existing SRO motels. There are a variety of strategies for property acquisition, including occupation by housing activists, eminent domain by the state or a community organization, acquisition by a social housing authority, or significant funding for CLT land acquisition.

How should these strategies be evaluated?

This project will evaluate property types for their feasibility to create decommodified housing; however, given the broad spectrum of potential land sources and resulting ownership strategies, I require consistent standards for evaluation. Scholars and housing justice organizations have considered a variety of standards to evaluate decommodified housing projects.

The Homes for All Campaign of the Right to the City Alliance created a Just Housing Index that evaluates housing based on five categories:³¹

- **Community Control:** Democratic structures of control by the building residents
- **Affordability:** Housing prices affordable for the neighborhood and quality of life
- **Inclusivity:** Inclusive of historically marginalized groups with an accessible location
- **Permanence:** Long-term protection against speculation and market conversion
- **Health & Sustainability:** Health and sustainable for both residents and environment

The Just Housing Index evaluates housing models based on benefits to the tenants and surrounding community. Meanwhile, in their comparative analysis of ten public-cooperative models, Ferreri and Vidal evaluate key phases where the state can encourage the production and maintenance of housing cooperatives:³²

- **Production:** Public entities can promote cooperative housing through access to land and financial resources
- **Access and Management:** Public entities can provide operational subsidies and regulate access to housing
- **Maintenance of the Model in Time:** Public entities can restrict cooperative units from conversion to market-rate units

The authors encourage any analysis of decommodified housing to consider property relations between the state, market, and society, the longevity of the model, and the insularity of the cooperative.

On a broader scale, Meehan (2014) evaluates community land trusts on their ability to influence societal change toward housing decommodification, asking whether CLTs are reformist or non-reformist reforms – do they “only serve to strengthen the system” or do they “call into question dominant practices?”³³ To determine whether a CLT enacts non-reformist reforms, Meehan considers three questions:

1. How far will they develop in the direction of internal democracy, as egalitarian communities;
2. to what extent can they bring about external transformation, by bringing more and more space under social control and by delegitimizing the treatment of land as a commodity, and
3. to what extent they can unit and act as a broad movement to affect land policy regionally and nationally.³⁴

While these different analytical lenses invite consideration of ownership, property relation, and social structure for the decommodified housing strategy over time, the context of housing decommodification necessarily requires reckoning with Black and Indigenous land struggle. I return to Malson’s call to respect intellectual genealogy: “it is critical to situate these radical breaks from existing housing markets as coming from a Black radical tradition of decolonization.”³⁵

Discussion

The literature on why we should decommodifying housing points to a variety of interlocking reasons: resistance to housing speculation, failure of current affordable housing provision models, the need for increased community control, and the broader movement for housing autonomy rooted in the Black decolonization tradition. The current moment of global pandemic and economic crisis gives particular urgency to this question. The literature on how to decommodify

housing is similarly varied and rooted in local context. A model as widespread as a community land trust varies significantly across organizations, even within the same city. This project seeks to answer the question of how to de-commodify housing within the particular context of Los Angeles, including land and property sources, existing housing justice work, and the political landscape. Using the examples of de-commodified housing across the United States and the world, I seek to analyze the Los Angeles context and identify feasible pathways to non-speculative housing.

Los Angeles County faces a housing crisis that requires housing solutions that challenge existing property relations, return control to communities, and provide long-lasting housing stability. Housing justice movements across the world are shifting the paradigm around marketized housing and pioneering radical grassroots housing cooperatives. I return again to Roy's provocation – in this moment of a global pandemic, racial uprising, and mass urban displacement, de-commodified housing provides an opening to reconfigure power structures and reclaim housing as a human right, not a property right.

Methodology

This project asks: what are feasible properties in Los Angeles County for decommodified housing? I analyze “feasibility” in this project with respect to the LA Housing Movement Lab’s goal to decommodify 20% of housing by 2050. I focus on four property types: congregation-owned land, at-risk naturally occurring affordable housing (NOAH), expiring affordability covenants, and publicly-owned land. These property types were chosen through conversations with movement partners who are already working on decommodifying housing on these types of property.

Data Sources

The main data sources are spatial datasets published by public agencies (Table 1) and interviews with organizers, planners, and other housing movement practitioners (Table 2).

Table 1: Spatial Data Sources

Name	Source	Description
Los Angeles County Parcels	Los Angeles County Assessor	All parcels in the County, including owner-ship type, existing use, and size
City of Los Angeles Housing Element Site Inventory	6th Cycle Housing Element: Appendix 4.1	List of potential parcels for development, including current use, zoning density, and parcel size within Los Angeles City limits.
Los Angeles County Publicly Owned Parcels Listing	Los Angeles County Assessor	Publicly-owned properties in the County
California Housing Partnership Preservation Database	California Housing Partnership	Publicly-subsidized affordable housing units at-risk of market conversion
Small Sites NOAH Preservation Tool	Chan Zuckerberg Initiative	Tableau tool that brings together a variety of public data sources to identify small, at-risk landlords in Los Angeles County.

Interviewees were identified through SAJE and the LA Housing Movement Lab’s networks based on their experience producing or preserving housing on the property types of interest.

Table 2: Interviews

Organization	Notes
LA Voice	LA Voice is a multi-racial, multi-faith organization. Their Faith in Housing initiative works with churches to develop affordable housing on their properties.
El Sereno Community Land Trust	The El Sereno Community Land Trust is working to obtain the Caltrans-owned homes reclaimed by a group of families in 2020.
Hillside Villa Tenant Association	Hillside Villa is an affordable housing development with an expired covenant. The tenants association is currently advocating for the City to use eminent domain to purchase the property and keep it affordable in perpetuity.
Venice Community Housing	Venice Community Housing is a mission-aligned affordable housing developer.
Municipal Planners	I interviewed city planners who preferred to remain anonymous in order to provide more robust insights.

Data Analysis

I analyze the data in two parts – first, a quantitative unit analysis to estimate a potential yield of decommodified units and second, a qualitative feasibility matrix analysis to identify challenges and opportunities for each property type.

Unit Analysis

To estimate a unit yield for each property type, I developed a methodology based on interviews and available data sources. Where possible, I have extended existing methods to avoid replication of work. Each method is informed by practitioners’ experience developing that type of property.

I include more detailed methodology about estimating the number of units under each property type in the Findings and Analysis section.

Feasibility Matrix Analysis

Using results from the literature review section “How should these strategies be evaluated?” and conversations with coalition partners, I chose to evaluate the property sources based on five criteria: cost, scalability, community control, process barriers, and political will. Then, using practitioner interviews and unit analysis results, I ranked each criterion as favorable, unfavorable, or neutral. These rankings are based on existing efforts in Los Angeles to decommodify housing, rather than the potential of the property source more broadly. By analyzing the specific local

conditions, the matrix results will highlight strengths and weaknesses of existing efforts. I further describe the criteria and rankings in Table 3 and Table 4.

Table 3: Feasibility Matrix Criteria

Cost	The estimated cost per unit, as relative to the cost of construction a new unit of affordable housing. In Los Angeles County, developments costs are approximately \$500,00 per unit. ³⁶
Scalability	The number of potential units for each property type using results from the unit analysis. While, scalability also overlaps with process barriers and political will, I focus primarily on the number of units.
Community Control	The land ownership model, tenancy type, tenant eligibility, and tenant management of the property. Though this project evaluates property sources, not ownership strategies, existing decommodification efforts in Los Angeles make some property sources more favorable than others.
Process Barriers	The legal, financial, and bureaucratic barriers to creating decommodified housing.
Political Will	The opposition or support of elected officials, government staff, developers, non-profits, and grassroots coalitions.

Table 4: Feasibility Matrix Rankings

Favorable	Criterion supports decommodified housing
Unfavorable	Criterion is a barrier to decommodified housing
Neutral	Criterion has no extreme or has the potential to be favorable or unfavorable, depending on development conditions

Strengths and Limitations

This research methodology is structured to center the experiences and knowledge of organizers, community land trusts, and other housing justice practitioners. The LA Housing Movement Lab relies on the expertise of coalition members to drive the movement forward. Through compiling the experiences of housing justice groups working to decommodify housing, I can analyze best practices, barriers, policy solutions, and advocacy priorities. The unit analysis provides a quantitative justification for the movement’s goals and the policy analysis provides a nuanced analysis as the movement determines strategic priorities.

The spatial data analysis is limited and primarily tailors existing methods to the movement’s needs. Most public datasets are published at the municipal level, not the county, which skews my

datasets toward the Los Angeles City and away from the remainder of the county. Additionally, existing efforts to decommodify housing are not easily quantified. For example, Hillside Villa tenants organized for eminent domain due to an expired affordability covenant, an extractive landlord, and personal histories of tenants previously displaced by eminent domain. The specific narratives motivating each example of grassroots decommodification efforts cannot be replicated within a geospatial analysis, but rather through organizing and coalition building.

Findings and Analysis

This section presents the findings of the unit analysis and feasibility matrix analysis, with a section for each property type. Table 5 and Table 6 show a summary of the results, while more detail is provided within in sub-section.

Table 5: Unit Analysis Results

	Parcels	Acres	Units
Congregation-Owned Land	269	198	3,963
Publicly-Owned Land	2,995	7,300	146,033
Naturally Occurring Affordable Housing	5,101	--	47,513
Expiring Affordability Covenants	183	--	8,873
		Total	203,545

Table 6: Feasibility Analysis Results

	Cost	Scalability	Community Control	Process Barriers	Political Will
Congregation-Owned Land	Neutral	Neutral	Unfavorable	Favorable	Favorable
Publicly-Owned Land	Favorable	Favorable	Neutral	Unfavorable	Unfavorable
Naturally Occurring Affordable Housing	Favorable	Favorable	Favorable	Unfavorable	Neutral
Expiring Affordability Covenants	Neutral	Neutral	Neutral	Unfavorable	Unfavorable

Congregation-Owned Land

LA Voice is a multi-faith community organization with a Faith in Housing initiative that seeks to build affordable housing on congregation-owned land in Los Angeles. They seek out congregations and work with them to develop vacant or underutilized land into affordable housing, primarily using Low Income Housing Tax Credit (LIHTC) funding. While congregations can develop their land into housing without LA Voice, the organization seeks to actively scale up this housing strategy across the county by building partnerships with individual congregations, working with developers, and advocating for policy changes. LA Voice's position at the intersection of organizing, development, and advocacy provides valuable insights for this property strategy. The Faith in Housing Initiative is only two years old and does not yet have any completed projects; however, LA Voice has 50 congregations in their pipeline and anticipate their first completed development in 2023.

Unit Analysis

Using the Los Angeles County Assessor Parcels, I filtered for parcels with the use type “churches” that are greater than 5,000 square feet (minimum lot size for housing construction). Then, I selected all parcels with a current use of “parking lot” or “vacant” and sorted them into bins by lot size. To estimate the total unit yield, I assumed more conservative 20 units/acre to account for irregular lots and local zoning restrictions. This method only identifies vacant lots or parking lots for housing development; however, LA Voice also works with congregations to convert underutilized church buildings to housing.

Across Los Angeles County, there are 269 church-owned parcels greater than 5,000 square feet with current use as parking lot or vacant. This sums to 199 acres and a potential yield of 3,980 units, assuming 20 units/acre. Table 7 breaks out these parcels by size and current use while Table 8 shows the acre and unit totals for each size group. The majority of parcels are less than half an acre, which presents challenges for developing cost-effective housing; however, the greatest acreage lies in the 0.5 - 2.0 acre category, which is promising for the type of small-scale developments organized by LA Voice.

Table 7: Congregation-Owned Parcels by Size

Parcel Size	Parking Lot	Vacant Lot
< 0.5 acres	166	2
0.5 - 2.0 acres	55	10
2.0 - 5.0 acres	7	2
5.0 - 7.0 acres	2	2
> 7.0 acres	0	3
Total	230	39

Table 8: Congregation-Owned Parcel Totals

Parcel Size	Acres	Units
< 0.5 acres	43	853
0.5 - 2.0 acres	63	1,251
2.0 - 5.0 acres	26	519
5.0 - 7.0 acres	26	513
> 7.0 acres	41	826
Total	199	3,963

Figure 1 displays the location of the congregation-owned parcels throughout the county. At the county supervisor district level, SD-2 (Holly Mitchell) and SD-4 (Janice Hahn) contain the most sites (Table 9). Figure 2 shows congregation-owned parcels within the City of Los Angeles. At the city council level, the CD-7 (Monica Rodriguez), CD-8 (Marqueece Harris-Dawson), and CD-9 (Curren Price, Jr.) have the most sites (Table 10). CD-8 and CD-9 primarily contain sites less than 0.5 acres.

Table 9: Congregation-Owned Parcels by Supervisor District

District	Parcels
SD-2	86
SD-4	73
SD-5	43
SD-3	35
SD-1	33

Table 10: Congregation-Owned Parcels by City Council District

District	Parcels
CD-9	18
CD-7	14
CD-8	11
CD-4	10
CD-1	8

Figure 1

Congregation-Owned Parcels

- < 0.5 acres
- 0.5 - 2.0 acres
- 2.0 - 5.0 acres
- 5.0 - 7.0 acres
- > 7.0 acres
- Supervisor District

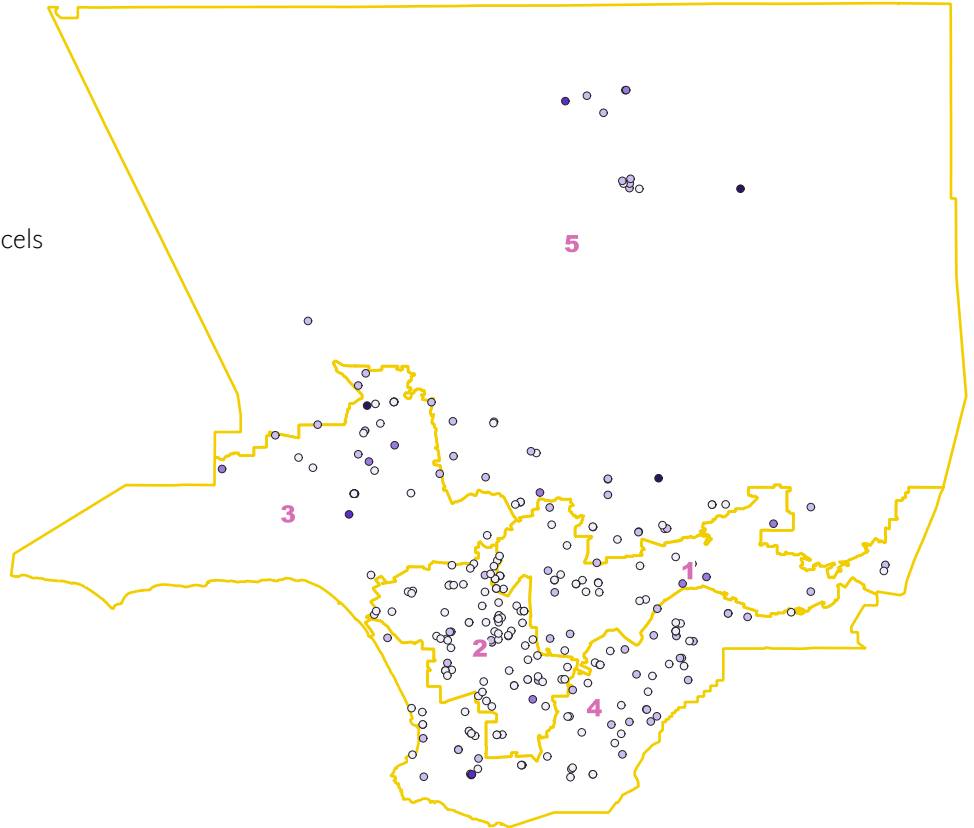
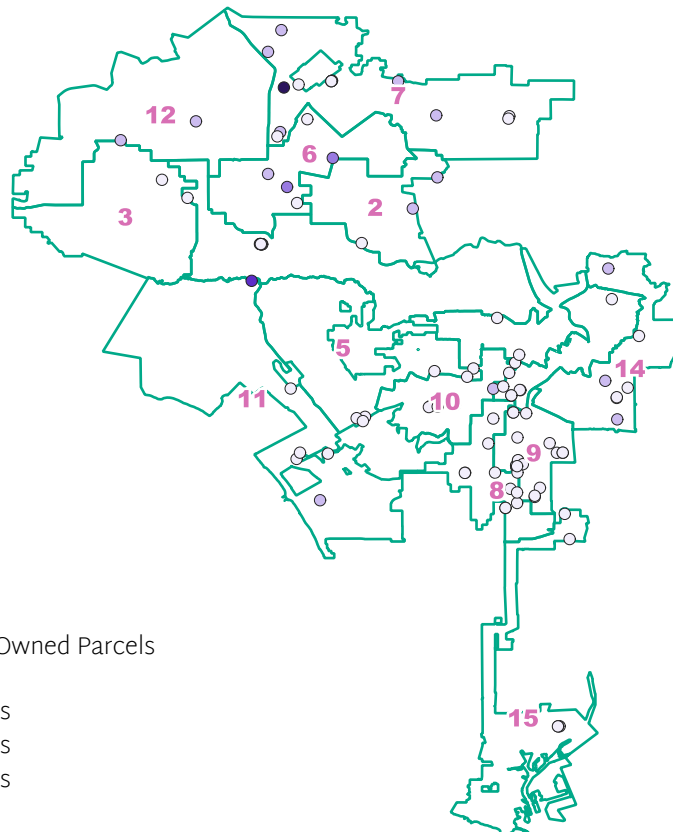


Figure 2

Congregation-Owned Parcels

- < 0.5 acres
- 0.5 - 2.0 acres
- 2.0 - 5.0 acres
- 5.0 - 7.0 acres
- > 7.0 acres
- City Council Districts



Feasibility Analysis

	Cost	Scalability	Community Control	Process Barriers	Political Will
Congregation-Owned Land	Neutral	Neutral	Unfavorable	Favorable	Favorable

The per unit cost for congregation-owned land is **neutral**. LA Voice firmly believes congregations should be compensated fairly for their land, which is particularly critical for insolvent churches in Black and Latinx communities threatened with displacement. Congregations do not donate their land for affordable housing, but rather the developer pays through a capitalized ground lease at fair market price. However, the full land costs are offset by innovative product types to fit small parcels and unfavorable zoning. As shown in the unit analysis, the majority of parcels are less than 2 acres and are often located in residential areas. As such, LA Voice is experimenting with ADU-style homes, bungalows, and off-site modular construction to meet site constraints and lower costs. While traditional LIHTC-style high rises are often \$500,000 per unit, LA Voice anticipates costs closer to \$300,000 for these different designs.

These innovative but smaller product types result in fewer units per acre, thus reducing the scalability of the strategy. The unit analysis estimates 3,963 units on 199 acres, assuming 20 units/acre. While congregation land has the smallest unit yield of the property types, these sites have a higher likelihood of development. The methodology only identified vacant parcels or parking lots, which are ideal for development, and LA Voice proactively seeks out congregations for development. Therefore, while the total unit yield is the smallest, the likelihood of development is higher than the other property sources, giving this a **neutral** rating.

After the ground lease is capitalized, the congregation has no further involvement in the affordable housing development. LA Voice’s involvement ends after the developers signs a development deal and a property management company ultimately manages the property after completion. Due to reliance on LIHTC and other public funding sources, the developments have mandated income and rent requirements for tenants and must adhere to fair housing practices when marketing the apartments – they are unable to specifically target neighborhood residents, even if the goal is anti-displacement. This funding model does not allow for tenant self-determination over affordability, maintenance, tenancy, and other aspect of shared life. Therefore, community control is **unfavorable**.

LA Voice identified zoning as their primary barrier. Congregations are often located in neighborhoods zoned for R1 or R2 with within limiting height and setback requirements. However, LA Voice has successfully advocated for congregational overlays throughout the county to allow for additional density on congregation land and is currently in talks with the City of Los Angeles to implement a similar overlay. Furthermore, they are advocating for AB 2244 to reduce parking requirements for housing projects on congregation land. The success of the congregational overlays, in addition to reliance on traditional affordable housing financing without additional community ownership complications, the process barriers are similar to other affordable housing developments and are ranked **favorable**. The success of these congregation overlay zones indicate significant political will for this type of development, despite LA Voice noticing local resistance to densification. Therefore, political will is also **favorable**.

Publicly-Owned Land

In 2021, the former Director of Housing Strategies at the Los Angeles Housing Department (LAHD), Helmi Hisserich, released the report *Scaling Up Equitable Housing on Public Land in Los Angeles*, which laid out high-level strategies for building 10,000 units of non-speculative housing on publicly-owned land.³⁷ However, Hisserich has since left LAHD and there has been no further action on the report. However, there have been efforts by the City of Los Angeles Controller's Office to identify publicly-owned land for homeless housing, developed through traditional affordable housing pathways. The Controller identified 26 city-owned properties suitable for housing in January 2022.³⁸

Movement-based organizations have encountered similar apathy to non-speculative housing on public lands. The El Sereno Land Trust has encountered significant resistance from Caltrans to transfer reclaimed homes to the trust as opposed to the housing authority. In South Los Angeles, the United Neighbors in Defense Against Displacement (UNIDAD) have organized for years to build affordable housing on the city-owned site of the former Bethune Library, arguing for "public land for public good;" despite their efforts, the city has attempted to build a hotel on the site instead.

Unit Analysis

Every city within Los Angeles County completes a site inventory as part of their housing element to identify suitable sites for housing development, including publicly-owned sites. However, it is beyond the scope of this report to analyze all 88 municipal site inventories in Los Angeles County. Rather, I will first look at the City of Los Angeles site inventory and estimate a unit yield on publicly-owned sites. Then, I will use the Los Angeles County Public Assessor's dataset, which includes all publicly-owned land in the county, to estimate a county-wide unit yield.

City of Los Angeles Housing Element

The City of Los Angeles Housing Element identifies 666 parcels owned by a public agency, totaling to 941 acres of land. Applying the maximum zoned density to each site yields 5,796 potential units on public land in the city. Table 11 shows the break-down of these sites by parcel size. The majority of sites are less than 0.5 acres and likely urban infill sites that may present challenges to development. Even so, these small parcels are zoned for high densities, resulting in the largest number of units across the size categories.

Table 11: Publicly-Owned Parcels by Size
(City of Los Angeles)

Parcel Size	Parcels	Acres	Units
< 0.5 acres	507	103	4,242
0.5 - 2.0 acres	111	105	1,371
2.0 - 5.0 acres	24	75	159
5.0 - 7.0 acres	5	29	5
> 7.0 acres	19	629	19
Total	666	941	5,796

The sites identified in the housing element are owned by a variety of public agencies, as shown in Table 12. As expected, the largest number of sites are owned by the City of Los Angeles, though surprisingly, water districts (primarily LADWP) own the second greatest number of sites. Upon inspection, many of these sites appear to be parking lots and vacant infill lots in urban areas.

Table 12: Publicly-Owned Parcels by Ownership
(City of Los Angeles)

Agency	Parcels
Municipal	1,123
County	210
Water District	179
School District	166
Other	225

Note: "Other" category includes Miscellaneous, Other, and Unknown.

Figure 3 shows the publicly-owned sites across the City of Los Angeles. Smaller sites are clustered within denser central city area with larger sites on the periphery. Table 13 shows site distribution across City Council districts – CD-5 (Paul Koretz), CD-4 (Nithya Raman), and CD-2 (Paul Krekorian) have the most sites.

Table 13: Publicly-Owned Parcels
by City Council District

District	Parcels	District	Parcels
CD-1	151	CD-9	46
CD-2	205	CD-10	52
CD-3	106	CD-11	175
CD-4	212	CD-12	85
CD-5	249	CD-13	61
CD-6	104	CD-14	100
CD-7	142	CD-15	155
CD-8	58		

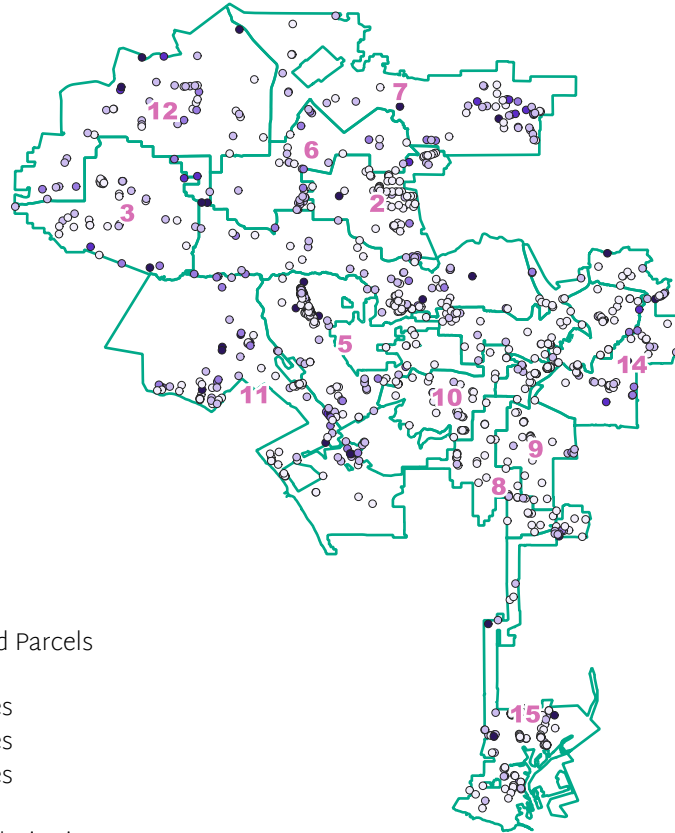


Figure 3
Publicly-Owned Parcels

- < 0.5 acres
- 0.5 - 2.0 acres
- 2.0 - 5.0 acres
- 5.0 - 7.0 acres
- > 7.0 acres
- City Council Districts

County Assessor's Public Parcels

The Assessor's Public Parcel dataset identifies all publicly-owned land across Los Angeles County; however, unlike the housing element site inventory, it does not identify sites that are suitable for housing. In order to pare down this dataset to more suitable sites, I filtered for all vacant sites greater than 5,000 sf and less than 20 acres, with a use type of commercial, residential, or government.

With this filtered dataset, I identified 1,996 publicly-owned parcels within the City of Los Angeles, which is three times as many parcels as compared city's housing element. Since I am unable to filter the dataset any further, I instead reduce my estimate of parcels across the county by 2/3 to account for sites unsuitable for housing.

Table 14 shows my initial calculation of 8,985 parcels across the entire county. Using a conservative 20 units/acre, these parcels yield 438,098 units. However, further reducing this estimate by 2/3 results in a more reasonable estimate of 146,033 units. Publicly-owned parcels across the county show a similar distribution of ownership to parcels within the City of Los Angeles – by far the largest portion are municipally-owned with water districts as the second largest category (Table 15).

Table 14: Publicly-Owned Parcels
(Los Angeles County)

	Parcels	Acres	Units*
Estimate	8,985	21,905	438,098
2/3 Reduction	2,995	7,302	146,033

* Estimated density of 20 units/acre

Table 15: Public Assessor Sites by Ownership
(Los Angeles County)

Agency	Parcels
Municipal	3,432
County	598
Water District	833
School District	575
Other	1,551

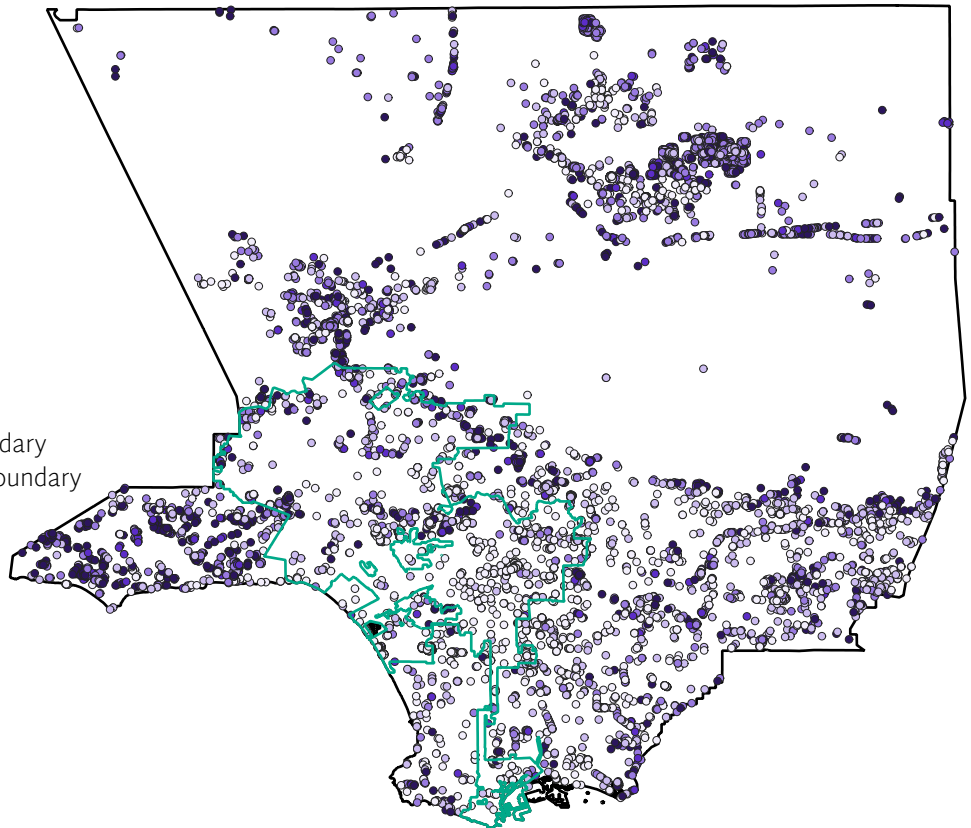
Note: "Other" includes Miscellaneous, Other, N/A, and LAX

Figure 4 shows all 8,985 public assessor sites throughout the county, categorized by size. Again, smaller sites are concentrated within the City of Los Angeles and larger sites in peripheral areas. The map confirms that 8,985 parcels is an over-estimate – many are located outside of urbanized areas and would be unsuitable for dense housing. Furthermore, coalition members focused on environmental justice note that many publicly-owned sites are contaminated, making them unsuitable for housing.

Figure 4

Publicly-Owned Parcels

- < 0.5 acres
- 0.5 - 2.0 acres
- 2.0 - 5.0 acres
- 5.0 - 7.0 acres
- > 7.0 acres
- Los Angeles City Boundary
- Los Angeles County Boundary

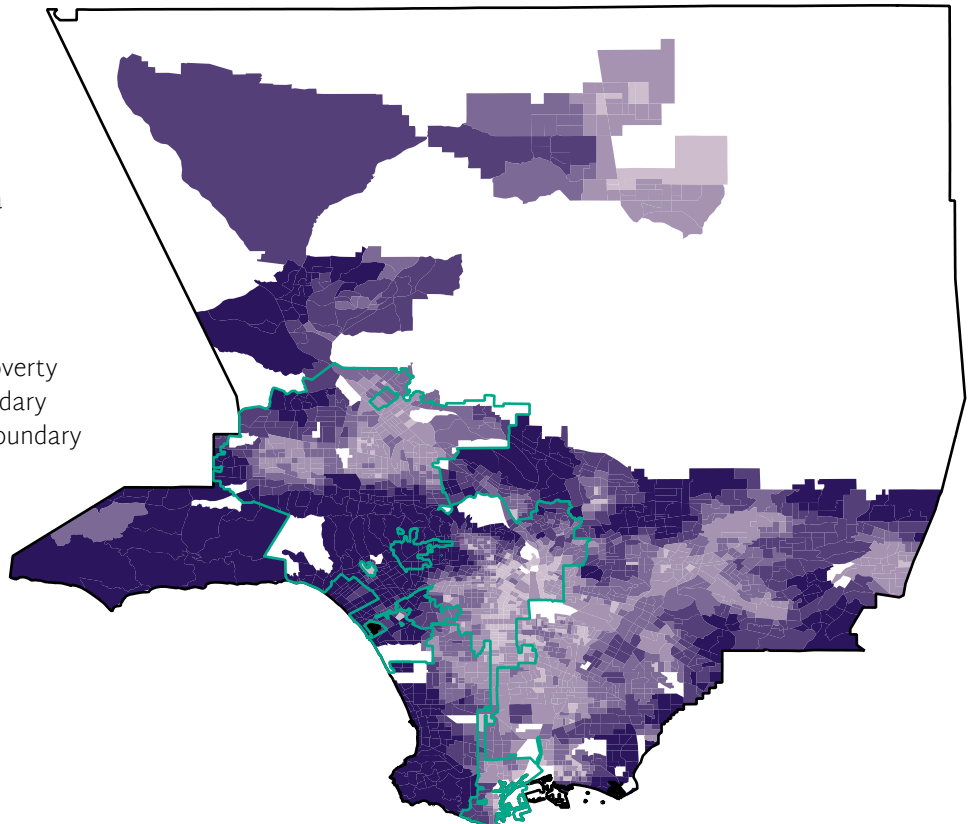


A more useful measure of spatial distribution is by opportunity area. The 2022 California Tax Credit Allocation Committee (CTCAC) Opportunity Area Map classifies regions in across California from High Resources to High Segregation & Poverty. Figure 5 shows the CTCAC Opportunity Map for Los Angeles County and Table 16 shows the number of sites that fall within in each opportunity zone. By far the smallest proportion of sites are in High Segregation & Poverty zones while the remainder of sites are evenly distributed across High Resource to Low Resource. Creating affordable housing in high opportunity zones is an important aspect of affirmatively further fair housing; however, there is the danger of further exacerbating inequality without equal investment in high poverty areas. Additionally, there may be pushback and additional expenses associated with developing non-speculative housing in high resource areas.

Table 16: Publicly- Owned Land by CTCAC Opportunity Area (Los Angeles County)

Opportunity Area	Parcels
Highest Resource	464
High Resource	463
Moderate Resource	584
Low Resource	584
High Segregation & Poverty	177

Figure 5
 CTCAC Opportunity Area
 ■ Highest Resource
 ■ High Resource
 ■ Moderate Resource
 ■ Low Resource
 ■ High Segregation & Poverty
 □ Los Angeles City Boundary
 □ Los Angeles County Boundary



Feasibility Analysis

	Cost	Scalability	Community Control	Process Barriers	Political Will
Publicly-Owned Land	Favorable	Favorable	Neutral	Unfavorable	Unfavorable

In addition to moral arguments for using “public land for public good,” developing public land for housing is particularly favorable due to reduced costs. Publicly-owned land would be either leased or sold for a nominal cost, eliminating land costs from the total development cost. Given high land costs in Los Angeles County, this is particularly desirable for decommodified housing. Therefore, cost is for public lands is **favorable**.

The Los Angeles City Housing Element identifies 666 publicly-owned parcels suitable for housing and the County Assessor identifies over 9,000 parcels across the county.³⁹ In the City of Los Angeles, the Controller has identified 26 city-owned properties to conduct feasibility studies for homeless housing, while at the county level, the 2021 Annual Progress Report identifies 78 surplus publicly-owned land for housing. At both the city and county levels, publicly-owned land is rated favorable for scalability, but unfavorable for process barriers due to the slow pace of development. These barriers include a slow parcel identification and RFP process and public agencies inexperienced in developing housing lacking the internal capacity to run the development process. In order to speed up the development of publicly-owned land, elected officials need to give priority, budget, and staffing to the project.

The City of Los Angeles 6th Cycle Housing Element identifies multiple programs to build over 7,000 housing units on publicly-owned land, indicating there is political will to develop housing on publicly-owned land. However, these developments would be either market-rate or LIHTC-style developments that do not fit within the decommodified housing models. Multiple interviewees expressed feeling resistance from city and county officials around non-speculative alternatives, identifying a strong preference for the current affordable housing model. Therefore, the political will to develop decommodified housing on publicly-owned land is **unfavorable**. Despite the current apathy toward different ownership models, community control is rated as **neutral**. Publicly-owned land still has great potential for decommodified sources, whether through public land banking strategies, social housing developments, or partnerships with community land trusts. Given the current lack of a major program to develop public lands through a streamlined RFP program, there remains potential to design a program to prioritize non-speculative strategies.

Naturally Occurring Affordable Housing

Naturally Occurring Affordable Housing (NOAH) are private housing units that are affordable without any government subsidies or intervention. As neighborhoods gentrify and housing prices increase, these units risk becoming unaffordable for the tenants and causing community displacement. The Los Angeles Community Land Trust (CLT) Pilot Fund was created in 2020 to provide \$14 million for CLTs to preserve affordable housing in low-income neighborhoods. While the program initially focused on Chapter 8 tax-defaulted properties, it was expanded in 2021 to include any type of property.⁴⁰ As of August 2021, only 43 units had been purchased through this program⁴¹ — a September 2021 report author by TRUST South LA describes their challenges accessing the funding in a timely manner to purchase properties on the private market.⁴² More broadly, TRUST South LA is working to expand their Community Mosaic program to purchase and rehab small multifamily developments and convert them to limited-equity co-ops. The Chan Zuckerberg Initiative (CZI) runs a related program — the Local Rental Owners Collaborative — which seeks to identify at-risk landlords of small affordable buildings and provide supportive funding to keep them affordable. While their strategy does not seek to decommodify housing, the methodology and datasets CZI developed to identify properties are useful for property identification.

Unit Analysis

The Small Sites NOAH Preservation tool created by the Chan Zuckerberg Initiative combines public and proprietary datasets, such as LA County Parcel Data, HCIDLA Foreclosures and Building Code Violations, and CoStar rent and property values. CZI devised a methodology to identify low, moderate, and high risk properties. The moderate and high risk assessments rely on neighborhood characteristics, such as at-risk jobs and percentage of people of color; however, I am not interested in identifying priority neighborhoods for this project, but rather the scope of potential properties. Therefore, I focus on building-specific characteristics. I adapted their definition of low-risk properties to create a NOAH definition for this project: buildings with 5-25 units that are over 20 years old, owned by a private individual or trust, and affordable at less than 50% AMI. By this definition of NOAH, there are 5,101 parcels (47,513 units) in Los Angeles County.

Table 17 shows the affordability level of the NOAH unit as a percentage of the area median income (AMI), which is \$77,300 in Los Angeles County (CZI). The majority of units fall within the 51%-80% AMI category, which includes households making \$38,650-\$61,840/year. There is clearly a dearth of naturally occurring affordable units for households making less than \$38,000/year. Figure 5 shows that 30% AMI units are concentrated within the City of Los Angeles, primarily in Supervisor District 2 (Holly Mitchell) and City Council Districts 1 (Gil Cedillo), 10 (Herb Wesson), and 13 (Mitch O’Farrell).

Table 17: NOAH by Affordability Level

Affordability Level	Parcels	Units
Affordable at <30% AMI	286	2,837
Affordable at 31%-50% AMI	4,815	44,676
Affordable at 51%-80% AMI	23,515	222,774

Figure 6

- Affordable at <30% AMI
- Supervisor District

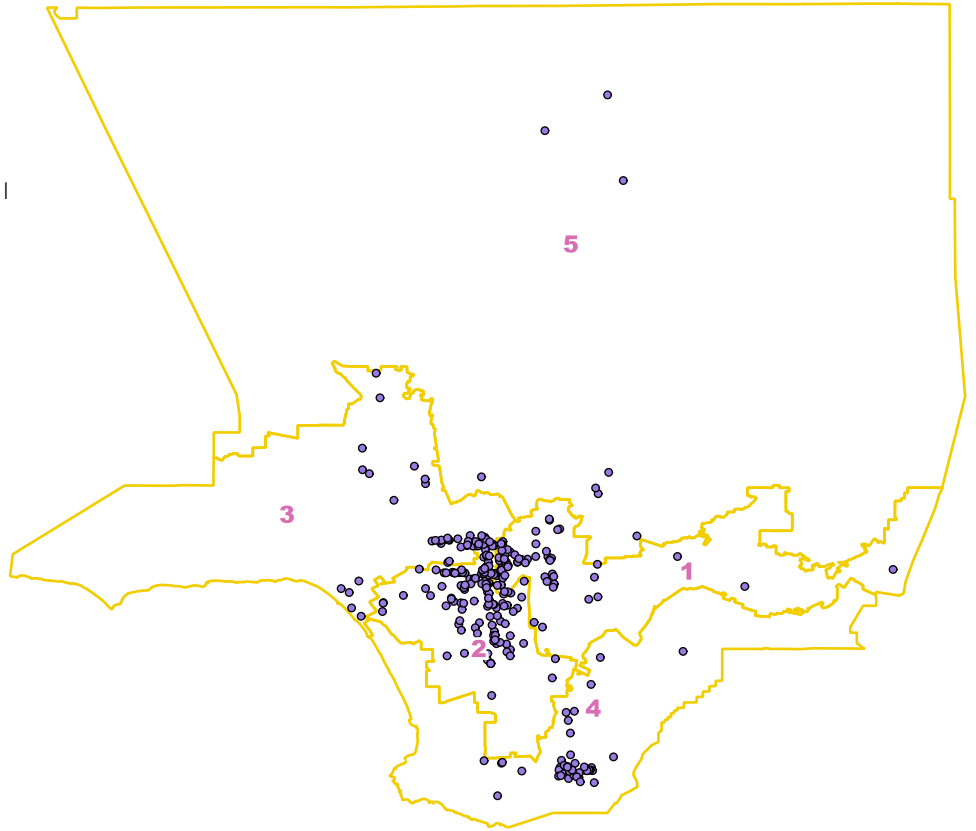
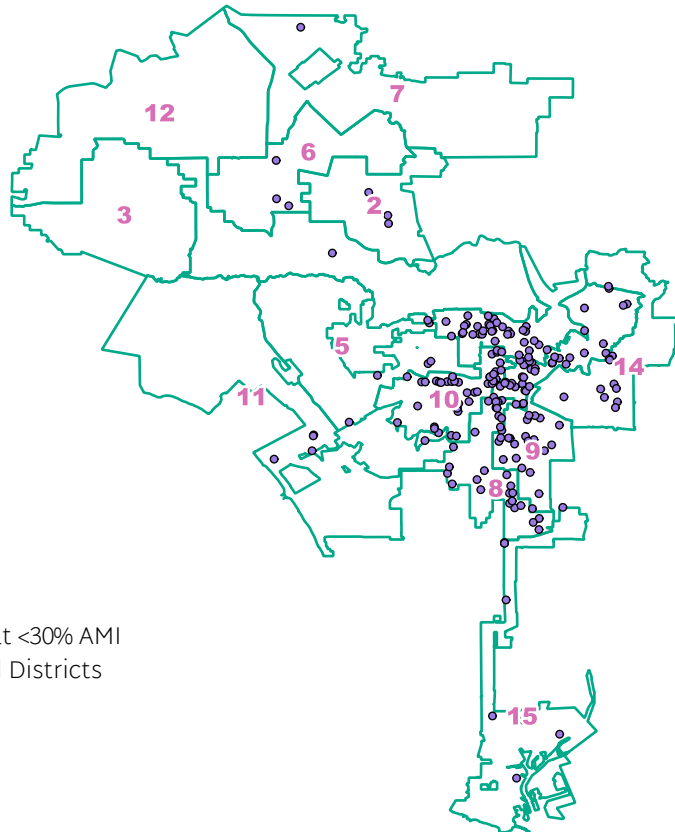


Figure 7

- Affordable at <30% AMI
- City Council Districts



In addition to affordability for households, I am also interested in the affordability of acquisition. Table 18 shows the breakdown of the cost per unit based on the LA County Assessor Office. While the majority of units fall below \$200,000, the Assessor’s valuation of properties is nearly always less than the actual market value of the unit. Even considering the increased market value, these costs per units are less than new construction units, which are over \$500,000 in LA County.

Table 18: NOAH by Cost per Unit

Cost per Unit	Parcels	Units
< \$100,000	13,425	135,707
\$100,000 - \$200,000	11,467	103,904
\$200,000 - \$300,000	2,972	24,861
\$300,000 - \$400,000	593	4,755
\$400,000 - \$500,000	91	725
> \$500,000	31	247

What are the characteristics of units valued at less than \$200,000? Of the 24,916 properties, a majority are small buildings with 5-9 units (Table 8). Furthermore, 70% of these properties are owned by a private individual or trust, as opposed to a larger corporate landlord. These units are older, located in buildings 50-70 years old (Figure 9). The age of the unit has implications for rehabilitation and maintenance costs associated with deteriorating properties. Indeed, 2,572 properties have at least one reported code violation since 2015.

Figure 8: Building Size (<\$200,000/unit)

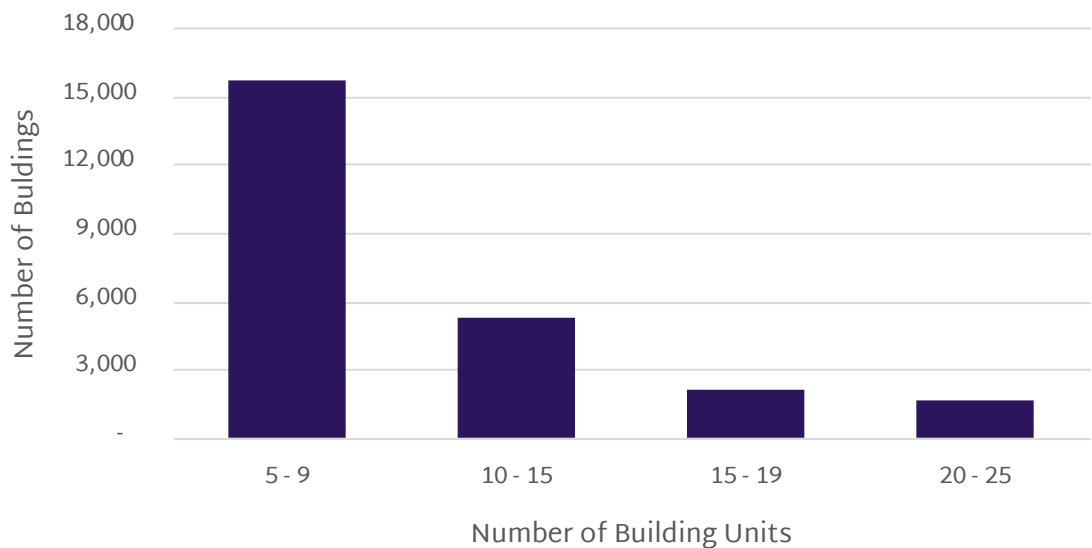
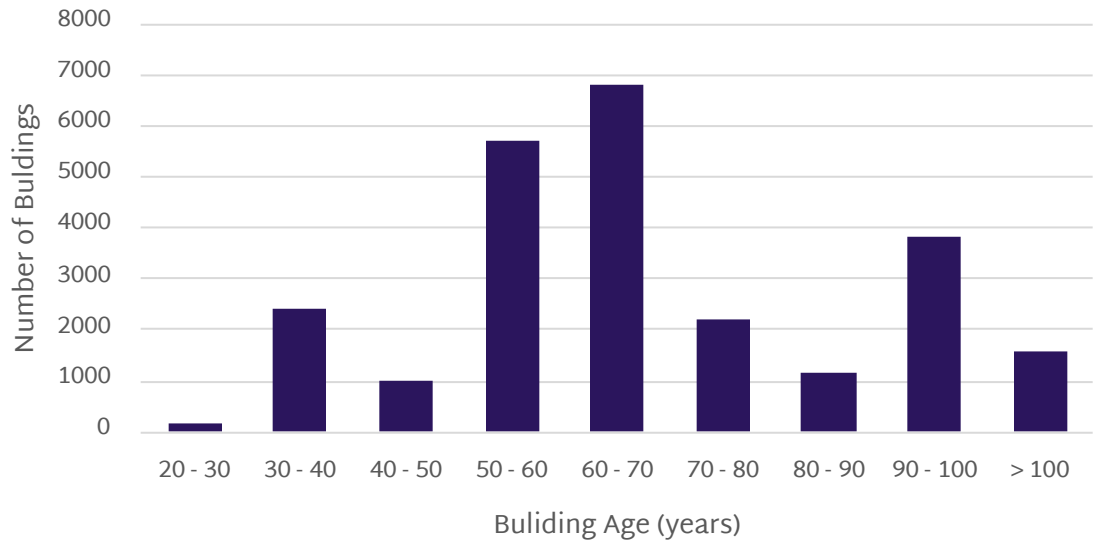


Figure 9: Building Age (<\$200,000/unit)



Feasibility Analysis

	Cost	Scalability	Community Control	Process Barriers	Political Will
Naturally Occurring Affordable Housing	Favorable	Favorable	Favorable	Unfavorable	Neutral

Property acquisition for NOAH, particularly in gentrifying areas, is an expensive prospect. Using NOAH acquisition funds from a community benefits agreement with USC, TRUST South LA found that acquisition costs were close to \$250,000 per unit.⁴³ In addition, the unit analysis shows that a significant number of NOAH properties identified are 50-70 years old and would likely require significant rehabilitation or even redevelopment after purchase. However, given that this cost is less than \$500,000 per unit for new construction and the current willingness of the County to fund acquisition, cost is rated as **favorable**. Furthermore, NOAH accounts for the second largest potential property source and largest preservation source in this analysis, making the strategy **favorable**. However, given the slow pace of implementation of the pilot fund and TRUST’s challenges accessing those funds, scaling up this strategy would require significant changes to the funding and acquisition process. TRUST identified the fast-moving private market and slower moving public funding as a barrier to acquisition, as well as the challenge of identifying properties that met funding requirements. Process barriers for this strategy are largely bureaucratic and rated **unfavorable**.

These current examples of NOAH acquisition ultimately place the properties in a community land trust or create a limited equity cooperative, giving this strategy a high degree of community control. TRUST itself uses a tripartite board structure — tenants, community members, and community organization leadership — to ensure shared decision-making and limited equity co-ops give tenants autonomy over their building. However, the quick pace of acquisition on the private market doesn’t give time for a CLT to work with tenants before the purchase and some tenants might not want to be part of a community land trust. TRUST identifies education about cooperatives as a key part of their Community Mosaic strategy to protect tenant self-determination. Overall, community control for this strategy is **favorable**.

As discussed in the analysis of publicly-owned lands, interviewees identified resistance to alternative ownership strategies by elected officials and city staff. However, at the County level, Supervisor Hilda Solis championed the CLT pilot program and its expansion. This initial program is promising, though not ensured to continue or be funded at the scale necessary. While the LA CLT coalition continues to advocate for favorable policies for CLTs, political will for this strategy is rated **neutral**.

Expiring Affordability Covenants

Affordable housing developments funded by the Low Income Housing Tax Credit (LIHTC) or other public funds require an affordability covenant for the property with a typical term of 55 years. After the covenant expires, the property owner is free to raise rents to market rates. Landlords who choose to raise rents as high as possible displace their low-income tenants. There are multiple strategies at covenant expiration to prevent displacement and even increase community control. Many 100% affordable housing developments are owned and/or managed by non-profit, mission driven organizations who are more receptive to extending the covenants to maintain the affordable units. Private owners with remaining debt on the property may be more receptive to extending the covenant by refinancing through LIHTC. However, in the case of the Hillside Villa located in Chinatown, the landlord immediately raised rents 150%, more interested in increasing profit from the property's desirable location near downtown rather than maintaining affordable units. The tenants organized rent strikes against this increase and then lobbied the city to use eminent domain on the property and transfer ownership to tenant control. Despite council approval to use eminent domain, the process is currently stalled in the budget committee for the \$48 million buy-out. Even if the city does proceed, tenants expect a protracted fight in court from the landlord, though they would be protected from eviction during the legal battle.

Unit Analysis

The 2020 Los Angeles County Affordable Housing Report⁴⁴ conducted a thorough overview of subsidized affordable units that are at-risk of market rate conversion in the next 10 years. Rather than replicating their methodology, I will summarize the report findings.

The report defines levels of market conversion risk as follows:

- **Very High:** Expires within a year, there are no known subsidies to extend affordability, and not owned by a large non-profit/mission driven developer.
- **High:** Expires in one to five years, there are no known subsidies to extend affordability, and not owned by a large non-profit/mission driven developer.
- **Moderate:** Expires in five to ten years, there are no known subsidies to extend affordability, and not owned by a large non-profit/mission driven developer.
- **Low:** Affordability restrictions extend beyond 10 years or the development is owned by a large non-profit/mission driven developer.

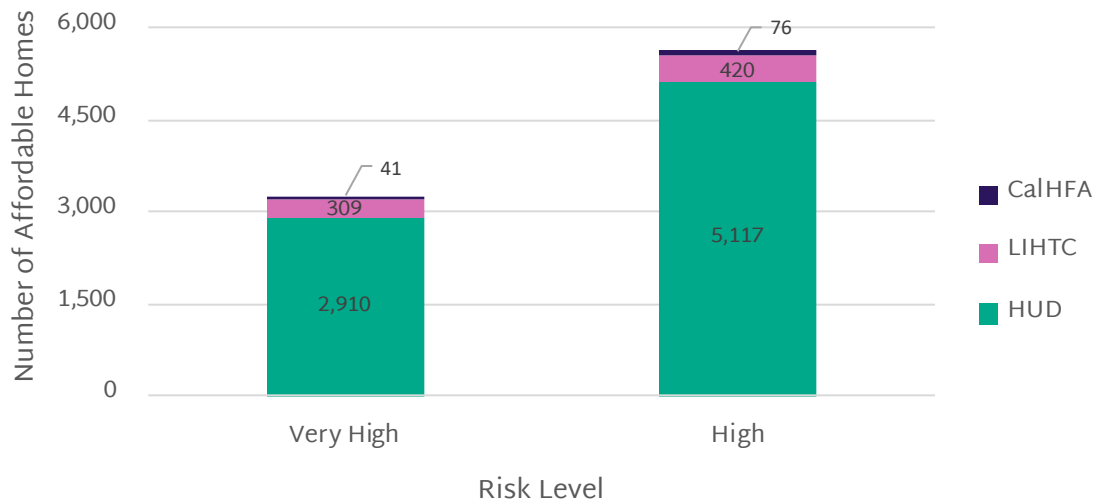
According to the report, there are 101,323 subsidized units in Los Angeles County and 9% are considered at-risk for market conversion by 2025. Table 19 shows the break-down of these developments by risk level. These units include both state and federally funds, as shown in in Figure 10. The majority of the units are federally funded through HUD. Figure 11 shows the distribution of all affordability covenants throughout the county with the highest concentration found in SD-2 (Holly Mitchell).

Table 19: At-Risk Covenants by Risk Level

Risk Level	Developments	Units	% of Total Inventory
Very High	76	3,260	3%
High	107	5,613	6%
Total At-Risk	183	8,873	9%
Moderate	40	2,368	2%
Low	1,320	90,032	89%
Total	1,543	101,273	100%

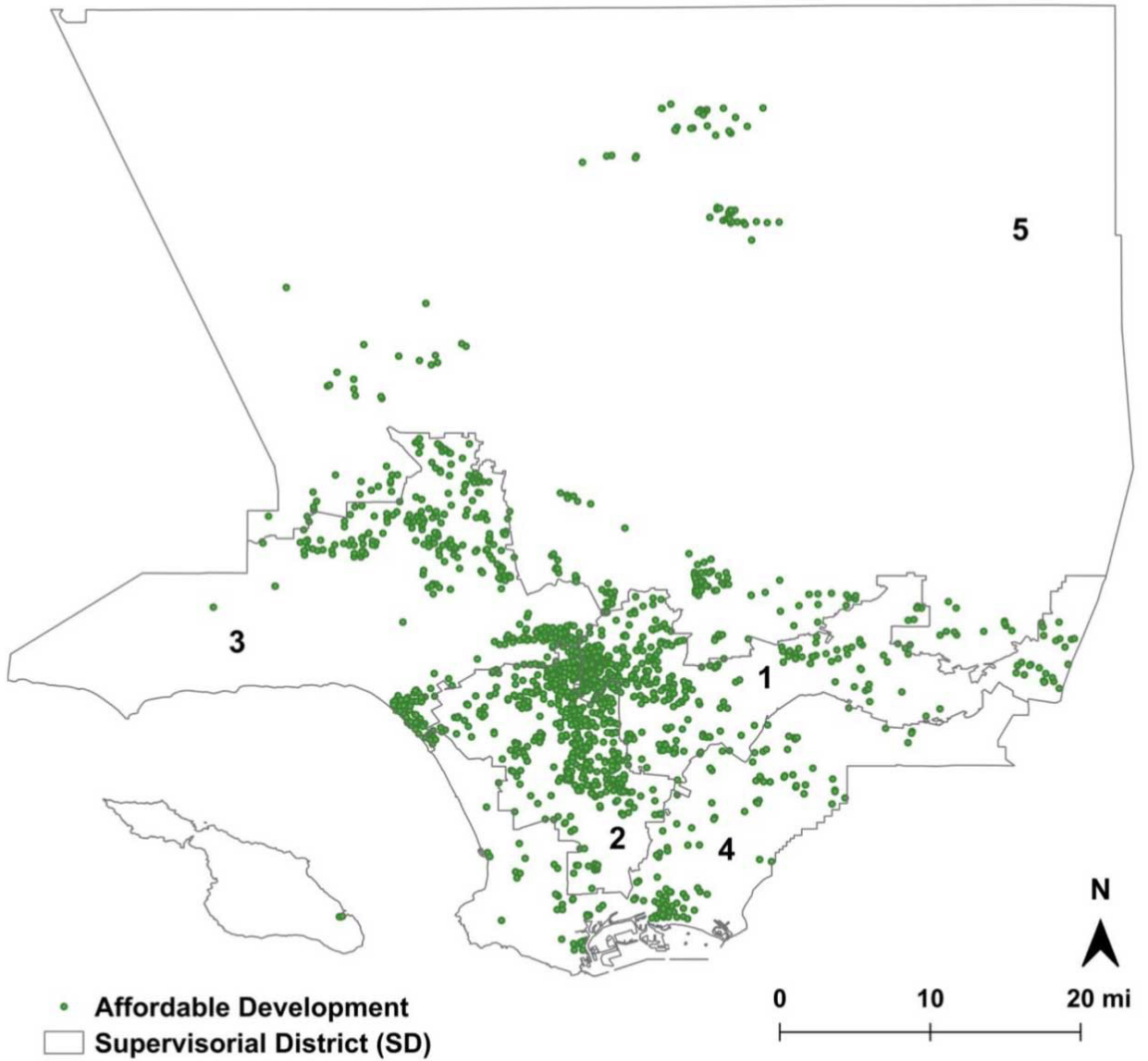
Source: 2020 Los Angeles County Affordable Housing Report

Figure 10: At-Risk Units by Funding Source



Source: 2020 Los Angeles County Affordable Housing Report

Figure 11: At-Risk Covenants



Source: 2020 Los Angeles County Affordable Housing Report

Feasibility Analysis

	Cost	Scalability	Community Control	Process Barriers	Political Will
Expiring Affordability Covenants	Neutral	Neutral	Neutral	Unfavorable	Unfavorable

The eminent domain strategy has the greatest potential for community control – the Hillside Villa Tenant Association is exploring options for a limited equity co-op and other shared ownership strategies if the eminent domain effort is successful. Meanwhile, simply extending the affordability covenant does not increase tenant control over the property but rather continues the status quo. While covenant expirations could create a window of opportunity for tenants to organize for a decommodified solution with a non-profit or mission driven developer, I am unaware of any example of this situation. Therefore, given this range of potential outcomes, community control is **neutral**. While eminent domain can result in the highest level of tenant autonomy, this is also the most expensive solution. The city must pay full value to the property owner, in addition to legal fees incurred through legal challenges. While the \$48 million for Hillside Villa would be in the form of a loan, this still represents a significant outlay for the city. Extending an affordability covenant is a far less costly solution. The higher the community control, the greater the cost; therefore, the cost for this property type is also **neutral**.

The powerful real estate and landlord lobby in Los Angeles is highly opposed to the use of eminent domain for housing. While all council members voted for the motion to use eminent domain at Hillside Villa, this was the result of massive public pressure and is unlikely to be used regularly in the future, particularly given the budgetary restraints. A common argument against this strategy is that developers would be disincentivized to build 100% affordable housing if they are unable to cash out on their investment after project maturation. This argument could be extended to the covenant extension strategy – if covenant is expected to be extended, then why should property owners invest in the first place? The strategy to decommodify properties with expiring covenant directly challenges the right to making a profit on housing; therefore, political will is **unfavorable**.

The unit analysis shows over 8,000 units of affordable housing at-risk of market conversion by 2025, which will continue to increase over the entire timeline of the LA Housing Movement Lab campaign (2050). However, compared to the unit yields for public land (146,033) and naturally occurring affordable housing (47,513), the scalability of this strategy is **neutral**. Furthermore, this strategy requires organizing and negotiation on a project-by-project basis and even more effort if tenants can win an eminent domain process. The success of each negotiation will largely depend on the willingness of the property owner and other contextual factors, such as the desirability of the building’s location. Therefore, the process barriers are rated **unfavorable**.

Discussion

The LA Housing Movement Lab estimates that approximately 12% of existing housing in Los Angeles County is decommodified. In order to meet the 20% goal while taking into considering the county's housing production needs, the Movement Lab needs to support 260,000 decommodified units by 2050. Table 20 summarizes the results of the unit analysis, showing that the total estimated from these property sources falls short of the 260,000-unit goal. Even though these four property sources are not the only land available for decommodified housing, they have the potential to meet nearly all of the Movement Lab's decommodification goal.

Table 20: Unit Analysis Summary

	Parcels	Acres	Units
Congregation-Owned Land	269	198	3,963
Publicly-Owned Land	2,995	7,300	146,033
Naturally Occurring Affordable Housing	5,101	--	47,516
Expiring Affordability Covenants	183	--	8,873
		Total	203,545

Publicly-owned land, a housing production source, has by far the largest potential unit yield across the county. Given the county's 812,000 unit production goal, public land could play a critical role in both addressing the housing shortage and producing decommodified units. Even though congregation-owned land has the smallest yield, this source is still important – churches often own land in single-family zoned neighborhoods and those properties are a chance to build dense, affordable housing in more exclusive areas. Additionally, these parking lots and vacant parcels owned by congregations are more likely to be developed due to LA Voice's proactive organizing efforts.

Naturally Occurring Affordable Housing has the largest unit yield of the preservation strategies and represents all units in buildings older than 20 years that are affordable at less than 80% of the area median income. Preserving existing affordable housing and converting to non-speculative ownership strategies has the largest potential to scale up, based on the unit yield. Expiring affordability covenants account for over 8,000 units over the next five years – over the course of the LA Housing Movement Lab's 2050 goal, many more covenants will expire and create opportunities for decommodifying the units.

Table 21: Feasibility Matrix Analysis Results

	Cost	Scalability	Community Control	Process Barriers	Political Will
Congregation-Owned Land	Neutral	Neutral	Unfavorable	Favorable	Favorable
Publicly-Owned Land	Favorable	Favorable	Neutral	Unfavorable	Unfavorable
Naturally Occurring Affordable Housing	Favorable	Favorable	Favorable	Unfavorable	Neutral
Expiring Affordability Covenants	Neutral	Neutral	Neutral	Unfavorable	Unfavorable

Overall, each property source is favorable or neutral for on **cost** and **scalability**. The costs are compared relative to the new construction of an affordable housing development, which can cost over \$500,000 per unit in Los Angeles. Each property source produces or preserves housing in a way that is less than or significantly less than new construction. For scalability, the unit analysis revealed the potential to scale each strategy far beyond existing efforts, with publicly-owned land and naturally occurring affordable housing the largest source of units.

These property sources encompass a range of **community control**. Congregation-owned land is marked as unfavorable due to current reliance on the traditional affordable housing development process, which does not provide community ownership or tenant autonomy. Naturally occurring affordable housing is the most favorable for community control given current efforts by community land trusts to purchase affordable properties and preserve them within the trust. Publicly-owned land and expiring affordability covenants have multiple pathways, with different levels of community control. While there is currently no large, concentrated effort to develop public lands for housing, such a program could design the RFP process to prioritize non-speculative solutions or maintain the land within a public trust. Expiring affordability covenants have a spectrum of strategies upon expiration – a mission-driven housing non-profit could choose to extend the affordability covenants or tenants could pressure the city to use eminent domain and convert the building into a tenant co-op, as Hillside Villa currently seeks to accomplish.

Political will and **process barriers** were overall unfavorable for these property sources. Decommodified housing strategies are far from mainstream and the financial, state, and non-profit infrastructure does not exist or does not work well with alternative housing ownership methods. Removing these process barriers also requires the political will to enact the changes. Shifting political will among elected officials, government staff, and in the general public will require a dedicated campaign to change the narrative from housing as a commodity to housing as a human right.

Publicly-owned lands are the most scalable source, based on the unit analysis, though will require significant changes in bureaucratic processes to develop the lands at scale with non-speculative ownership models. Since this is a housing production strategy, scaling development on publicly-owned lands will address the housing shortage and relieve pressure on market rate housing. Naturally Occurring Affordable Housing is the most favorable property source for affordable housing preservation, based on the unit analysis and existing efforts. This strategy can be scaled up through extending the LA County Community Land Trust Pilot program and providing funding for CLTs to increase their internal capacity.

Recommendations

In order for the LA Housing Movement Lab to meet its strategic goal of 20% decommodified housing by 2050, the coalition needs to support the decommodification of 260,000 units. The unit analysis estimated 203,000 units from the four property types and the feasibility analysis identified opportunities to scale each strategy. I provide recommendations to facilitate decommodified housing on each property type as well as general recommendations for the broader housing decommodification movement.

Congregation-Owned Land

- **Congregational Overlay:** LA Voice identified zoning as a primary barrier to building dense affordable housing on congregation-owned land. A congregational overlay would increase housing densities on church-owned land, facilitate zoning changes from church to residential, and create a ministerial approval process.
- **Congregational Community Land Trust:** Currently, congregation land identified by LA Voice is sold to a developer to build affordable housing units, which does not support decommodification of housing. A Congregational Community Land Trust could instead hold these properties in trust, keeping the homes affordable in perpetuity and under community control.
- **Advocacy Opportunities:** Supervisor District 2 (Holly Mitchell) and District 4 (Janice Hahn) contain the most congregation-owned sites. At the Los Angeles City Council level, the most sites are in CD-7 (Monica Rodriguez), CD-8 (Marqueece Harris-Dawson), and CD-9 (Curren Price, Jr).

Publicly-Owned Land

- **County Public Land Inventory:** Create a countywide inventory of public land suitable for housing using housing element site inventories. This inventory could support local advocacy efforts to build affordable housing on public land.
- **Water District Land:** The unit analysis showed that water district land was the second largest source of public land in both the city and county. Initial investigation showed many of these sites are parking and vacant infill lots. Further investigation is needed to evaluate the suitability of this land for housing and the ability of water districts to donate, sell, or develop the land.
- **Advocacy Opportunities:** CD-5 (Paul Koretz), CD-4 (Nithya Raman), and CD-2 (Paul Krekorian) have the most publicly-owned sites.

Naturally Occurring Affordable Housing

- **Tenant Opportunity to Purchase Act (TOPA):** TOPA gives tenants the first right of refusal upon sale of their building. This act would facilitate purchasing existing naturally occurring housing by a land trust or tenant co-op.
- **Extend Community Land Trust Pilot Program:** The LA County CLT Pilot Program provides funding for community land trusts to acquire housing. Extending this program to provide a permanent source of funds for NOAH acquisition would significantly support preservation and decommodification of existing affordable housing.
- **Advocacy Opportunities:** NOAH units affordable at less than 30% area median income are concentrated in Supervisor District 2 (Holly Mitchell), CD-1 (Gil Cedillo), CD-10 (Herb Wesson), and CD-13 (Mitch O'Farrell).

Expiring Affordability Covenants

- **Database of Covenant Expiration:** Create a database of buildings with affordability covenants and their expiration dates to facilitate tenant organizing as the expiration date nears. This information could be incorporated into SAJE's OWN-IT tool, an online map that

- identifies at-risk properties to support tenant organizing.
- **Research Expiring Covenant Strategies:** Utilizing eminent domain on a building is politically and fiscally costly for a city. While eminent domain can be a tool of last resort, additional research is needed on other strategies to keep tenants in affordable units after a covenant expires, and particularly strategies that lead to decommodification and increased community control.
- **Advocacy Opportunities:** The highest concentration of affordability covenants is in Supervisor District 2 (Holly Mitchell).

General

- **Public Banking:** The feasibility analysis found that accessing financing for both production and preservation strategies using non-traditional ownership methods presented a significant barrier. AB-857 authorized Los Angeles to charter a public bank, which could provide more flexible and faster loans to community organizations and tenant associations. A governance proposal report by the Democracy Collaborative for a Los Angeles Public Bank include recommendations to provide lines of credit for social housing developments, affordable housing preservation, and tenant acquisition.⁴⁵
- **Los Angeles County Affordable Housing Solutions Agency (LA CAHSA):** Public sector development capacity could be increased through a program such as SB-679, a proposed state bill to create the Los Angeles County Affordable Housing Solutions Agency (LA CAHSA). This agency would provide “significantly enhanced funding and technical assistance at a regional level for renter protections, affordable housing preservation, and affordable housing production.” This agency could develop an aggressive program to identify and develop publicly-owned lands through interagency collaboration and streamlining the RFP process to prioritize land trusts, co-ops, and other non-speculative solutions. The agency could identify at-risk affordable housing and place into a trust, assist tenants in negotiating extended affordability covenants, and build up the use of eminent domain as a tool of last resort for preserving affordable housing. A dedicated public agency like LA CAHSA would provide the budget, staffing, and political will needed to adequately support the infrastructure of decommodified housing.
- **Research on Housing Production and Decommodification:** Los Angeles County faces a severe housing shortage and has a RHNA production goal of 812,000 units by 2029. The unit analysis shows that the two largest unit yields are from a production strategy (publicly-owned land) and a preservation strategy (naturally occurring affordable housing). In this push for housing production, what role does decommodification play? Should decommodification strategies focus only on preservation? If passed, the United to House LA ballot measure will provide funding for the production of decommodified housing. What strategies should be explored with that program and how can decommodified production be scaled?

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